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MEMO ENDORSED

May 12, 2021

VIA ECF

The Honorable Katherine Polk Failla United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: Sanchez v. BitPay, Inc., Case No. 1:21-cv-02282-KPF

Dear Judge Failla:

We represent defendant BitPay, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff Cristian Sanchez, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from May 12, 2021 to June 28, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub
Timothy J. Straub

cc: All counsel of record (by ECF)

Application GRANTED. All deadlines and conferences in this matter are hereby ADJOURNED sine die. The parties shall file a stipulation of voluntary dismissal or a status update to the Court on or before **June 28, 2021**.

Dated: May 12, 2021

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA

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UNITED STATES DISTRICT JUDGE